

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
KENNETH WINFIELD	:	VIOLATIONS:
		18 U.S.C. § 371 (conspiracy - 1 count)
	:	21 U.S.C. § 1029(a)(2) (credit card fraud -
		1 count)
		Notice of additional factors

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Amtrak was an interstate passenger rail service, providing train transportation nationwide. Amtrak took reservations for train travel and issued tickets on those reservations when provided with credit card information.
2. J.W., a person known to the United States Attorney, had access to credit card information as an employee at a hotel in Philadelphia.
3. From on or about January 11, 2003 through on or about May 12, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

KENNETH WINFIELD

conspired and agreed, with J.W. and others known and unknown to the United States Attorney, to commit an offense against the United States, that is, to knowingly and with intent to defraud make unauthorized charges on stolen credit card numbers, in violation of Title 18, United States Code, Section 1029(a)(2).

MANNER AND MEANS

It was part of the conspiracy that:

4. Defendant KENNETH WINFIELD used credit card numbers stolen by J.W. from a Philadelphia hotel to fraudulently purchase Amtrak train tickets. As a result of this scheme, Amtrak suffered a loss of approximately \$14,222.

5. After receiving the stolen credit card numbers from J.W., defendant KENNETH WINFIELD called Amtrak and made train reservations using the stolen credit card numbers.

6. Defendant KENNETH WINFIELD then picked up the fraudulently ordered tickets, usually before the true account holders had stopped the unauthorized charges. Defendant WINFIELD frequently picked up the tickets through automated ticketing machines located in Amtrak's 30th Street Station in Philadelphia.

OVERT ACTS

In furtherance of the conspiracy, the defendant, and others known and unknown to the United States Attorney, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. J.W., a person known to the United States Attorney, took from a Philadelphia hotel documents recording the credit card numbers of guests.

2. J.W. provided the stolen numbers to defendant KENNETH WINFIELD.

3. Defendant KENNETH WINFIELD fraudulently purchased approximately \$14,222 in Amtrak train tickets using at least six stolen credit card numbers.

4. Defendant KENNETH WINFIELD went to Amtrak's 30th Street Station in Philadelphia and other places to physically retrieve the fraudulently obtained tickets.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 4 of the overt acts in Count 1 are incorporated here.
2. From on or about September 2, 2003 to on or about November 24, 2003,
in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

KENNETH WINFIELD

knowingly and with intent to defraud used and attempted to use an unauthorized access device, that is, an American Express credit card with the last three digits 008, in the name of P.D., to obtain things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$1,495 in Amtrak train tickets, thereby affecting interstate commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and (b)(1).

PATRICK L. MEEHAN
UNITED STATES ATTORNEY